

July 9, 1999

William Hubbard
Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville MD 20852

9177 '99 JUL 13 AM 11:21

Re: Docket No. 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

Dear Mr. Hubbard,

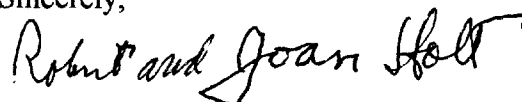
We want you to know that we are deeply concerned about the prospect that FDA may weaken the labeling requirements for irradiated food. We are alarmed about several known dangers of irradiation. (1) It destroys vitamins and causes changes in sensory and spoilage qualities that are not obvious or expected by the consumer. (2) Irradiation creates a new class of unique radiolytic products that have never been tested for possible carcinogenic effects on humans. And (3) The irradiation process creates new volumes of radioactive waste from Cobalt-60 and Cesium-137 which will expose workers to toxic radionuclides and create a further problem of storing them, when we haven't a clue as to what to do with the nuclear waste we already have.

Therefore, any foods, or any foods containing ingredients that have been treated by irradiation, should be clearly labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the radura, the international symbol of irradiated food. If the food is not packaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale.

Like other labels required by federal law, irradiation labels must be truthful and not misleading. Proposals to use euphemistic phrases like "cold pasteurization" are inappropriate because pasteurization is an entirely different process of rapid heating and cooling. The terms "treated with radiation" or "treated by irradiation" should be retained because they accurately portray the irradiation process. The radura symbol, without written disclosure, is not adequate.

Consumers have a right to know how their food has been processed. Please ensure that labeling requirements are strengthened, not weakened.

Sincerely,



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